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January 14, 2019

By email and ECF

The Honorable Roanne L. Mann
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Michael Brogan, 18 M 1206

Dear Judge Mann,

I write to request modifications of Mr. Brogan's bond conditions to allow him to travel to Southern California from January 16, 2019 to January 22, 2019 to visit with his uncle (who is ill), his cousin and his cousin's family and to change his home detention condition to a curfew while he is in California. *Application granted in part and denied in part. Mr. Brogan is authorized to travel to Southern California from January 16, 2019, returning on January 22, 2019, to visit with his sick uncle, with whom he reportedly will be residing during his stay.*

Mr. Brogan was arrested on December 12, 2018 and was released on a \$50,000 bond with a condition of home detention later that day. Prior to his arrest, he had purchased an airline ticket from JFK to Long Beach, CA, planning to visit his uncle and other family in Fullerton, CA. He now asks the court to approve a modification of the bond to allow this travel. Both Pretrial Services and the government consent to the requested travel. *his stay.*

Mr. Brogan also asks the Court to modify the condition of home detention to a curfew while he is in California. Pretrial Services has objected to this modification, stating that there has not been a change in circumstances to warrant the change. I have not yet heard the government's position on the curfew request. Because the condition of home detention was instituted to ensure that Mr. Brogan stay away from the complaining witness (who lives in Washington, D.C.), he submits that being thousands of miles away is sufficient reason to modify the home detention condition to a curfew while he is in California. *taking into account the objection of Pretrial Services, and the seriousness of the change, the Court declines to eliminate the home detention condition during Mr. Brogan's visit; instead, he is to remain on home detention at his uncle's home while in Southern California. so ORDERED: /s/ RLM 1/14/19*

Thank you for your attention to this matter.

Respectfully Submitted,

/s/

Michael Schneider, Esq.

cc: Clerk of the Court (by ECF)
AUSA Philip Selden (by email)
PTSO Amanda Carlson (by email)